

EXHIBIT AA

In the Matter Of:

UNITED STATES vs STATE OF GEORGIA

1:16-cv-03088-ELR

WILLIAM MATTHEW JONES

January 10, 2023



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1 Q Did you ask any questions?

2 A I likely did but I can't recall specific
3 questions.

4 MS. TUCKER: I'd like the court reporter
5 to mark the following document as Plaintiff's
6 Exhibit 829.

7 (WHEREUPON, Plaintiff's Exhibit-829 was
8 marked for identification.)

9 BY MS. TUCKER:

10 Q This is a July 19th, 2016 email produced
11 by the State.

12 It's from Nakeba Rahming to you, with the
13 subject "Message Script and PPT."

14 There are two attachments, and the Bates
15 number on the first page of this document is
16 GA03468710.

17 Do you recognize this email?

18 A I do.

19 Q And PPT in the subject refers to
20 PowerPoint?

21 A Yes.

22 Q Let's turn to the first attachment, which
23 has the Bates No. GA03468711.

24 And this is the PowerPoint.

25 Do you see it?

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1 A Yes.

2 Q The PowerPoint, do you recognize it?

3 A I do.

4 Q And the first -- the title page reads
5 "GNETS Facilities Online Meeting"?

6 A Yes.

7 Q Who created this PowerPoint?

8 A I believe Nakeba pulled this PowerPoint
9 together.

10 Q Did you ask her to?

11 A I think it was part of the plan once the
12 decision was made around facilities to pull together
13 a meeting like this, and I think she created the
14 PowerPoint from there.

15 Q Did you review it in advance of the
16 meeting?

17 A I did, but I remember it being extremely
18 tight turnaround.

19 Q Looking at the Slide 2 with the title
20 "GNETS Facilities Online Meeting," your name is
21 right under the title.

22 Did you lead the meeting?

23 A I believe I opened the meeting.

24 Q Did you join the meeting in its entirety?

25 A Yes.

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1 Q Looking at Slide 7, when you're there.

2 A Yes.

3 Q Okay. It reads, quote: "Nine out of the
4 multiple sites will need to relocate students
5 immediately." And then in parentheses "before the
6 beginning of school." End parentheses, end quote.

7 Do you see that?

8 A I do.

9 Q Who made this decision?

10 A The State Board.

11 Q Were you part of conversations with the
12 State Board about this decision?

13 A Very limited conversations.

14 Q What do you mean by that?

15 A It was essentially a directive. They had
16 decided it.

17 Q Were you there when they made the
18 decision?

19 A I was there when it was communicated, not
20 necessarily the back and -- the discussions that
21 they had on their end.

22 Q Did you ask follow-up questions?

23 A We expressed that it would be more ideal
24 to close out the school year just to limit
25 disruptions to students.

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1 Q So this was before the 2016-17 school
2 year. So just to make sure I understand, were you
3 saying to continue having these facilities open
4 during the 2016-17 school year and then closing out
5 the next year?

6 A Yes. I think it was in the -- let me see
7 the date.

8 Yes, it was just to be the start at the
9 school year.

10 Q Right.

11 A So I think we were trying not to disrupt
12 the start of the school year. So I think it wasn't
13 -- my apologies.

14 Not to finish out the school year but at
15 least get through the first semester to minimize the
16 impact on students because a lot of schools were
17 just about to start within the next few weeks.

18 Q And what did the State Board say back to
19 your proposal?

20 A They wanted to move forward with the
21 current plan to shut -- relocate the students
22 immediately.

23 Q Did they provide any additional context on
24 the immediacy?

25 A No.